

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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HUDSON PRIVATE LP,

Plaintiff,

v.

CREATIVE WEALTH MEDIA FINANCE CORP.,

Defendant.
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: Case No. 7:22-cv-05520-JGLC
:
: **MOTION FOR**
: **DEFAULT JUDGMENT**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, Declaration of Christopher Conover, and the exhibits thereto, Declaration of Kevin Fritz, Esq., and the exhibits thereto, and upon all pleadings and proceedings had herein, plaintiff Hudson Private Corp. (“Plaintiff”) will move this Court, before the Honorable Jessica G. L. Clarke, at the United States Courthouse, 500 Pearl Street, New York, NY 10007, at a date and time to be set by the Court, for an Order: (1) pursuant to Federal Rule of Civil Procedure 55(b)(2), striking defendant Creative Wealth Media Finance Corp.’s (“Defendant”) Answer and granting Plaintiff a default judgment against Defendant based upon Defendant’s failure to retain substitute counsel and to respond to Plaintiff’s motion for sanctions within the timeframe permitted by the Court (Dkt. 82); said judgment to be in the amount of \$3,000,000.00, which is the principal amount of the Promissory Note dated July 16, 2020 (the “Note”) at issue herein, plus contractual interest at the rate of 10% per annum (compounded annually) from July 16, 2020 through the date of collection, plus additional interest at the rate of 1.5% per month from January 3, 2022 through the date of collection, plus Plaintiff’s reasonable attorneys’ fees and expenses incurred in connection with the

collection and enforcement of the Note; and (2) granting Plaintiff such other and further relief as the Court deems just and proper.

Dated: New York, NY
January 11, 2024

Respectfully submitted,
MEISTER SEELIG & FEIN PLLC

/s/ Kevin Fritz
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